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April 24, 2014

Via Hand Delivery and ECF

The Honorable Robert E Gerber
United States Bankruptcy Court
for the Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: *In re Motors Liquidation Company, et al.*, Case No. 09-50026 (REG)

Dear Judge Gerber:

We have Mr. Weisfelner's letter of the 23rd. While we believe it premature for plaintiffs to be required to assert the grounds for their legal opposition to General Motors' papers, nonetheless for completeness we note that in addition to the critical issues which Mr. Weisfelner identifies there is a substantial question as to whether claims asserted against new GM (both statutory and otherwise) based on the post-sale conduct of new GM are or even could be the subject of any orders of the Bankruptcy Court.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Elihu Inselbuch". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Elihu Inselbuch

cc: Edward S. Weisfelner, Esq.
Sander L. Esserman, Esq.
Arthur Steinberg, Esq.
Richard C. Godfrey, Esq.